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ATTORNEYS FOR  
DEFENDANT NETFLIX, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BROADCOM CORPORATION *et al.*,

Plaintiffs,

v.

NETFLIX, INC.,

Defendant.

Case No. 3:20-cv-04677-JD

**JOINT STIPULATION TO MODIFY  
CERTAIN DEADLINES AND  
[PROPOSED] ORDER**

Dept.: Courtroom 11, 19th Floor  
Judge: Honorable James Donato

Date Filed: March 13, 2020

Trial Date: January 27, 2025

Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Broadcom Corporation and Avago Technologies International Sales PTE. Limited (“Broadcom”) and Defendant Netflix, Inc. (“Netflix”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and request as follows:

### SHOWING OF GOOD CAUSE

WHEREAS, the current Court-ordered schedule sets January 9, 2025, as the date of the Pretrial Conference;

WHEREAS, under the Court’s Standing Order for Civil Jury Trials, the deadline for submitting the pretrial filings is 14 days before the Pretrial Conference;

WHEREAS, 14 days before the January 9, 2025, Pretrial Conference is December 26, 2024—the day after Christmas;

WHEREAS, the Parties have agreed to move forward the date for submitting the pretrial filings to December 13, 2024;

WHEREAS, under the Court’s Standing Order, the deadline for lead trial counsel to meet and confer regarding the pretrial filings is November 26, 2024;

WHEREAS, the Parties have agreed to move forward the deadline for lead counsel to meet and confer regarding the pretrial filings to October 22, 2024;

WHEREAS, the Parties have agreed among themselves to various deadlines for exchanging drafts of certain pretrial filings; and

WHEREAS, the Court’s Scheduling Order will otherwise remain unchanged;

NOW THEREFORE, the Parties respectfully request that this Court order the following modification to the Scheduling Order:

Event	Current Deadline	Proposed Deadline
Lead trial counsel to meet and confer re: preparation of joint pretrial materials	November 26, 2024	October 22, 2024

Event	Current Deadline	Proposed Deadline
Exchange of deposition and discovery response designations (not filed with the Court)	<i>None set</i>	November 1, 2024
Exchange counter-designations and objections to deposition and discovery-response designations (not filed with the Court)	<i>None set</i>	November 22, 2024
Exchange exhibits and exhibit lists (not filed with the Court)	<i>None set</i>	November 19, 2024
Exchange objections to exhibit lists (not filed with the Court)	<i>None set</i>	December 3, 2024
Exchange witness lists (not filed with the Court)	<i>None set</i>	November 15, 2024
Parties exchange motions <i>in limine</i> (not filed with the Court)	December 12, 2024	November 26, 2024
Parties exchange oppositions to motions <i>in limine</i> (not filed with the Court)	December 22, 2024	December 9, 2024
Pretrial filings	December 26, 2024	December 13, 2024
Pretrial conference	January 9, 2025, at 1:30 p.m.	<i>Unchanged</i>
Parties to file deposition and discovery designations, including counter-designations and objections	January 22, 2025	<i>Unchanged</i>
Jury Trial	January 27, 2025, at 9:00 a.m.	<i>Unchanged</i>

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE JAMES DONATO  
UNITES STATES DISTRICT JUDGE

KEKER, VAN NEST & PETERS LLP

/s/ Courtland L. Reichman  
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DEFENDANT NETFLIX, INC.

**ATTESTATION**

In accordance with Civil Local Rule 5-1(h)(3), I attest that each of the signatories have concurred in the filing of this document.

Dated: October 10, 2024

By: /s/ Courtland L. Reichman  
Courtland L. Reichman